



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary

April 28th, 2016

**Re: WC Docket No. 10-90
Totah Communications, Inc. A-CAM Version 2.2
Competitive Coverage Challenge**

Dear Ms. Dortch:

On behalf of Totah Communications, Inc. (Totah), Fred Williamson & Associates, Inc. (FWA) files the following Comments via the FCC's Electronic Comment Filing System (ECFS) to challenge the competitive coverage contained in the Alternative Connect America Cost Model ("A-CAM") version 2.2 pursuant to the streamlined challenge process established by Public Notice¹

Please contact me if you have any questions.

Sincerely,

Tim Morrissey
President, FWA, Inc

¹ See Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process to Competitive Coverage, WC Docket No. 10-90, Public Notice (rel. Apr. 7, 2016) ("Public Notice").

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund et al.)	WC Docket No. 10-90
Connect America Cost Model Version 2.2 And Illustrative)	
Results And Challenge Process to Competitive Coverage)	

TO: The Wireline Competition Bureau (Bureau)

COMMENTS – PUBLIC NOTICE

Fred Williamson & Associates (FWA), Inc. submits these Comments on behalf of Totah Communications, Inc. in response to the Commission’s Public Notice regarding the Challenge process to competitive coverage reflected in the Connect America Fund (CAF) Cost Model, WC Docket No. 10-90, released April 7, 2016 (“*Public Notice*”). FWA provides cost, financial and other consulting services for rural Independent Local Exchange Carriers (rural ILECs).

In this Public Notice, the Commission initiated a Challenge Process for unsubsidized competitors that are reflected in Alternative Connect America Cost Model (A-CAM), Version 2.2. The model has fields that indicate for each census block whether the block is served by a qualifying unsubsidized competitor. Specifically, in the Commission’s *Rate of Return Reform Order*,¹ the Commission directed the Bureau to provide a final opportunity for commenters to challenge the competitive coverage contained in the updated version of the model.² These comments provide challenges to competitive coverage data reflected in the A-CAM 2.2 for Totah Communications, Inc. (Totah), Study Area Codes 412030 and 432030. There are two circumstances reflected in the competitive data in the model that Totah is challenging:

¹ Connect America Fund et al., WC Docket No. 10-90 et al., Report and Order et al., FCC 16-33 (rel. March 30, 2016) (*Rate-of-Return Reform Order*).

² Id. At 29, para. 71.

1. Select census blocks that overlap Totah's study area boundary are also served by another local exchange carrier (LEC). Several of such census blocks, are inappropriately designated as "served" by a competitive wireline provider in the A-CAM. The A-CAM inaccurately indicates and assumes that the other LEC has facilities and customers within Totah's study area boundary. Attachment 1 identifies the census blocks that inappropriately reflect another LEC as a competitor.³ Attachment 1 also contains correspondence that indicates the other LEC does not provide service within Totah's study area boundaries. The A-CAM should be modified to split these census blocks and to reflect these census blocks as "unserved" by a wireline competitor.
2. The A-CAM information indicates that a wireline provider is a qualified competitor in several of the census blocks.⁴ Attachment 2 identifies the census blocks inappropriately indicated as "served" by the wireline provider. Also, referenced in Attachment 2 are zip codes for those census blocks. For each zip code, "screen shots" from the wireline provider's website are provided that indicate that the wireline provider does not provide service in the respective service areas, including the referenced census blocks. The A-CAM should be modified to indicate these census blocks are "unserved" by a wireline competitor.

³ Totah has not challenged all census blocks that overlap its study area boundaries that are potentially served by another LEC, but only those where the A-CAM shows high costs. These census blocks represent those with costs at or above \$50.00 per location/month. The challenge is isolated to the high cost blocks for two reasons. First, these are the only blocks that impact the support amount calculated in the A-CAM. Second, due to the expedited nature of this challenge process, this facilitated meeting the April 28, 2016 deadline.

⁴ See Footnote 3. For the same reasons cited, Totah has only challenged the high cost census blocks shown as served in the A-CAM by the wireline competitor.

We appreciate the Bureau's cooperation with this matter.

Respectfully submitted,

FRED WILLIAMSON & ASSOCIATES, INC.

By, Tim Morrissey

President

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Broken Arrow, OK 74012

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Dated April 28, 2016

High Cost Census Blocks Inappropriately Shown as Served - Totah, SAC 432030 & 412030

CB	SAC	WiredServed	ILECServed	WirelessServed	ProviderName
401051722001098	432030	Served	Unserved	Unserved	Craw Kan Telephone
401051722001000	432030	Served	Unserved	Unserved	Craw Kan Telephone
201259507004015	412030	Served	Unserved	Unserved	KanOkla Telephone

Note: See attached letters for census blocks that demonstrate that the neighboring Rural LECs do not serve inside Totah's regulated service territory.



April 25th, 2016

Craig Wilbert

General Manager

Craw-Kan Telephone Cooperative, Inc.

200 N. Ozark

Girard, Kansas 66743

TO WHOM IT MAY CONCERN:

Craw-Kan Telephone Cooperative (SAC 411818) does not provide Wireline-based Broadband services inside the regulated study area boundaries of Totah Communications, Inc. (SAC 432030).

Sincerely,

Craig Wilbert

General Manager

Craw-Kan Telephone Cooperative, Inc.



April 25th, 2016

Dana Pierce, Chief Executive Officer
KanOkla Networks
PO Box 111
100 KanOkla Ave,
Caldwell, KS 67022

TO WHOM IT MAY CONCERN:

KanOkla Networks (SAC 431788) does not provide Wireline-based Broadband services inside the regulated study area boundaries of Totah Communications, Inc. (SAC 412030)

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dana Pierce', is written over the word 'Sincerely,'.

Dana Pierce
Chief Executive Officer
KanOkla Networks

High Cost Census Blocks Inappropriately Shown as Served - Totah, SAC 432030 & 412030

CB	ZIP CODE	SAC	WiredServed	ILECServed	WirelessServed	ProviderName
401310508022003	74080/74053	432030	Served	Unserved	Unserved	Vyve Broadband A, LLC
401310508022027	74080/74053	432030	Served	Unserved	Unserved	Vyve Broadband A, LLC
401310508022054	74080/74053	432030	Served	Unserved	Unserved	Vyve Broadband A, LLC
401310508022079	74080/74053	432030	Served	Unserved	Unserved	Vyve Broadband A, LLC
200199646005085	67355	412030	Served	Unserved	Unserved	Vyve Broadband A, LLC
200199646006180	67361	412030	Served	Unserved	Unserved	Vyve Broadband A, LLC

Note: See attached screen shots for zip codes indicated that demonstrate Vyve does not serve the census block.







